

Comments for MB Docket No. 04-233.FCC Commissioners:

KIOW is a single owned station in a single station small market. It's service to its community and region is a model for radio community service, and models, I believe, how the majority of U.S. radio broadcasters serve their communities and regions.

Concerning the proposed rulemaking to mandate how broadcasters serve their communities:

1. Renewal Processing Guidelines

totally unnecessary and counterproductive

We already certify our community service on our existing renewal applications. KIOW can produce volumes of documentation of its community service, if the FCC is truly interested in looking at it. However, this is totally unnecessary and counterproductive, since the considerable amounts of time and money invested in costly, precious and limited station staff resources, should continue to be invested in producing the local station community services, rather than diverted to FCC documentation tasks that nobody would look at anyway.

This proposal is unnecessary because KIOW already provides per week:

News: 23 expanded local newscasts; 34 State newscasts; 168 National newscasts; 336 local area weather forecasts; and devotes 20% to 25% of its broadcast day to news and information.

Local public affairs: 6 local 5-10 min interviews and 6 community activities 5 min programs on local public affairs, politics or community activities.

PSA's: 28 local psa's per week on various community concerns such as blood drives.

Local emergencies: Station staff at the station or within 5 minutes of the station nights, overnights, and weekends, gets local emergency programming on the air quickly and in time to save lives.

Automatic EAS relay of NOAA weather radio warnings maintains 24/7 warning capability.

Political: Interviews and reports from officeholders, local, state and federal, are aired weekly. Free time is offered to all to discuss legislative news and political issues.

Daily Interview 10 minute program: Encourages all segments of the community to reach out to the whole community.

Local musician promotion: Preference is given to music by local musicians, according to artistic merit.

2. Ascertainment/Advisory Boards

Totally unnecessary and counterproductive

Local manager, local news director and local marketing staff are in constant daily contact with community leaders; ascertainment is already performed on a daily basis through these contacts and through personal service

on community boards, chambers of commerce boards and committees, churches, service groups, etc.

On-air interviews with various local and regional public service organizations such as the North Iowa

Child Sexual Abuse Prevention Committee, keeps us ascertaining daily the needs and interests of underserved and minority segments of the community.

We are a local station that addresses local issues and concerns. A "one size fits all"

requirement for every station in the country, regardless of market and station size and characteristics, would be counterproductive.

3. Remote Station Operations

Changes are totally unnecessary and counterproductive:

Requiring KLOW to be manned nights, overnights and weekends, would drain limited and precious financial resources away from, and compromise our ability to maintain trained, qualified and competent program staff during the regular business day, that can create and produce local programming for both attended and unattended broadcast times. The new technologies have improved and increased KLOW's ability to air more of and more relevant local programming. Being required to have personnel at the station 24 hours a day, seven days a week, would decrease our ability to ascertain the interests of our local community or offer programming that meets those needs, in terms of money and resources drained away from the staff needed to accomplish local creation.

Local unattended operation does not hinder KLOW's ability to provide emergency information.

Emergency designated on-call staff carrying cell-phones assures that announce staff is available during unattended times within 5 minutes to the station to broadcast more and additional emergency information.

All sheriffs, police and emergency management personnell are constantly informed of KLOW's emergency cell-phone number to call, and backup numbers to reach station announcers in emergency situations. And during unattended operation, there is also an emergency forwarding button on the stations phone system for callers to push that automatically forwards emergency calls to the emergency response cell phone 24/7. More important, KLOW's EAS automatically relays 24/7 NOAA initial emergency weather warnings faster than a human person can, and alerts on weather emergencies during both attended and unattended operation. And also the alert is also automatically broadcast and then relayed to other North Iowa stations for automatic broadcast 24/7. It can't get any quicker than that. All of this also works on Amber Alerts.

Arranging these alternative, less draconian measures, can increase this local public service, improving and expanding the service, making use of new technologies and being manpower productive and efficient, all at the same time.

4. Main Studio Location

Changes are totally unnecessary and counterproductive:

Companies can now own more than one station in a market, and one main studio location is OK for locating those stations. It is inefficient to require a separate main studio location for each station owned by an individual company in a market. Again, this proposed requirement would drain precious money and time resources away from the creation of local responsive programming, thus diminishing the stations ability to produce locally originated programming.

5. Voice tracking/National Playlists

KIOW uses limited voice tracking, but only by local station announcers in this community, and only that which is necessary for same day or next day broadcast. KIOW's use of voice tracking has little effect on whether we have the presence of broadcasters in our community. KIOW's use of voice tracking does improve our ability to serve the programming needs and interests of our local community, by inserting local information and programming to be broadcast at unattended operation times. However, stations that voicetrack with voicetracks from more than 50 miles away, in my opinion, do not serve the public.

On music programming, KIOW formulates a local music playlist selecting a mix of new artists, old artists, unknown artists, well known artists, and some local new, old, unknown, and well known artists. All selections are made solely on artistic merit, with input and acceptance from our local audience, and also selected on the ability to appeal to our local audience and with the recording's ability to find a local following.

I fail to see how requiring broadcasters to submit data about the airing of music by local artists, in consideration of a stations license renewal application, is even relevant.

A radio station will air music that attracts and finds a certain audience, because the radio station wants and needs to find that audience or following, in an attempt to develop as large of an audience as possible, just as the artists recordings the station broadcasts, wants and needs to find a following or audience for that artist and that recording.

If the station gets positive feedback on a recording, it will increase the number of plays on that recording.

And vice versa, if the station gets negative feedback, it will decrease the number of plays or stop airing that recording. Contrary to what record companies want you to believe, that is how hit recordings are made, and listener value in hit recordings, is made. Multiple plays on radio stations.

So why should the FCC get involved in what essentially is the decision of the listeners to that station,

as to what recordings that radio station plays. Yes, the disc jockeys that program and play that music are constantly trying out recordings on their audience to see if the listeners like them, but its the audience that asks to hear it more or not to hear it anymore.

Disc jockeys give the initial exposure on what they think their audiences will like. But its a local audience decision, that is better left to independant objective artistic merit decisions by the local station and their local listeners, rather than decisions being made by the FCC.

Above comments for MB Docket No. 04-233.

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